EXHIBIT 2

NEODE'S BARCLAY

THOMAS J. O'CONNOR

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July 15, 2010

Dennis J. Artese, Esq. Anderson Kill & Olick, P.C. 1251 Avenue of the Americas New York, New York 10020

Re: Insured

Richard E. Hall and Mark R. Laskowski

DOL

January 10, 2010

Location

5758 Mill Street, Eaton, NY 13334

Claim Number:

13531489-01

Policy Number:

H32-221-361798-900

Dear Mr. Artese:

As you know, we have returned the original documents provided at the examination under oath. Attached is an inventory of the documents that were provided to us by category.

We are also enclosing a copy of the disk to which we have scanned the provided documentation, as well as a listing of the contents of the disk showing the date ranges and descriptions of each category of documents. You will note that there is a column for the documents that are missing from the established date ranges.

You will note from a review of the inventory of materials copied that, in some cases we only have one or two statements that fall within the requested date range. If those statements are consecutive, then the "missing document" column will not list any missing statements since there are none missing within the date range. However, it is our position that, if this account was open from January, 2008 through January, 2010, then our request requires the production of 25 statements, or 23 more than have been provided. Therefore, we renew our request for the missing documentation.

You were also provided with transcripts of the examination under oath of your clients on July 2, 2010, and, it is my understanding that the transcripts have been submitted to your clients for review and execution. We will require a second examination under oath of each witness and the transcripts must be executed before that deposition takes place. Please provide some proposed dates in August when you and your clients will be available and at a time when you expect to have the transcripts of the examination under oath subscribed.

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We renew our request for the following documentation requested during the examination under oath, and repeated on July 2, 2010:

- 1. Call log records for both cell phone and landline telephones for the month of the loss;
- 2. A copy of the checking account register for each active checking account for 2009 up to February, 2010;
- 3. Credit card statements or other proof of the rental of the DVD from Price Chopper (Red Box) shortly before the fire;
- 4. Contingency bill payments using the funds from the November, 2009 liquidation of personal property and the 2009 withdrawal of life insurance cash value.

Please be advised in response to your inquiry, that Liberty Mutual is not in a position to provide a deadline for its coverage opinion in this case. As you can see from the enclosures, the insureds have not complied with the Company's document requests thus far, and until that is completed, as well as the examination under oath process, a coverage opinion cannot be made since the claim is not fully submitted. We will move forward as expeditiously as possible in order to expedite the decision-making process, and I trust that you and your clients will cooperate in this regard.

Arrangements have been now been made for the insureds' consultants to have access to evidence that has been secured by Liberty Mutual, and we understand that process will go forward on August 2 and 3, at the loss site and at FFA's lab where evidence has been stored.

In that regard, we have been advised that the bank has now taken possession of the property, and access to the inside of the house can only be obtained by contacting Mac Properties, 315-699-1325 to set up an appointment. Apparently, the bank has retained this organization to manage the property in foreclosure. It is our understanding that if access to the building is not required, then no permission is required to be on the grounds examining the fire debris.

This letter does not constitute a waiver of any stipulation or condition of the policy or any admission of liability thereunder, and we specifically reserve all of the rights and defenses of our client.

Thomas J. O'Connor

TJO:sbh Enclosure

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| File Name | Description | Date Range | Missing |
|--|---|--|---|
| | • | _ | Statements |
| Citi Platinum-9507 | Citi Driver's Edge Platinum Select Acct. No. 5424 1808 9215 9507 | 4/4/07-3/5/08 | 05/07 06/07 07/07 |
| Discover-3170 | Discover Acct. No. 6011 0023 7034 3170 | 4/20/07-7/22/08 | 12/07 01/08 Closing Date 8/20/07 |
| | | | Closing Date 12/20/07 Closing Date 4/20/07 Closing Date 5/20/07 |
| Home Depot-1907 | The Home Depot Acct. No. 6360 1907 | 1/24/07-5/22/08 | Closing Date 5/22/07 Closing Date 12/24/07 |
| Lowes-3270 | Lowe's Account No. 819 2433 156327 0 | 06/04/07-3/4/08 | 07/07 08/07 09/07 10/07 12/07 01/08 |
| Prudential FIA Card-8193 Sears MasterCard-9253 | Prudential Financial FIA Acct. No. 5200 0160 1613 8193 Sears Gold MasterCard Acct. No. 5121 0717 6546 9253 | 4/07-1/08 7/11/07-6/10/08 | 12/07 Payment Due: 01/11/08 Payment Due 05/10/08 |
| SYMS GEMB-2869 Wal-Mart Discover-5334 | SYMS/GE Money Bank Acct. No. 6012 5035 5097 2869 Wal-Mart Discovery Acct. No. 6011 3100 0862 5334 | 2/16/07-4/16/07 12/8/07-4/7/08 | Statement Date: 03/16/07 01/07/08 03/07/08 |
| Acct. No. 10033828905 Acct. No. 10017570127 | Electric Bill 5758 Mill St., Eaton NY 13334 Electric Bills 5758 Mill St., Eaton NY 13334 | 2/4/10 12/7/07–11/6/08 | 01/08 05/08-10/08 |
| Acct. No. 10017570101 Acct. No. 10017570119 | Electric Bills 5758 Mill St., Eaton NY 13334 Electric Bills 5758 Mill St., Eaton NY 13334 | 2/6/08–2/4/10 2/6/08–2/4/10 | 05/08-10/08 12/08 02/09-04/09 07/09-08/09 |
| Audi Financial Services Payments Acct. No. 847504417 | Borrower Richard Hall VIN - WA1AV74L07D011029 | 12/16/07 4/4/10 | |
| Life Insurance AARP Premium Notices Prudential Financial Prudential | Contract No. A2650937; Level Benefit Term Life Policy; \$50,000 Contract No. 13 550 321; Dividend Notice Contract No. 71 283 895; Dividend Notice; 1983 Joint Life Policy | 2/15/07 5/15/10 7/26/08 5/6/08 | |
| Mortgages Franklin Credit Mortgage Countrywide Bank of America | Loan No. 0002311130 Loan No. 133135403 Loan No. 133135403 | 1/11/07 – 7/10/08 1/4/07 – 4/29/08 10/1/09 & 11/1/09 | |

| File Name | Description | Date Range | Missing Statements |
|--------------------------------|--|------------------|-----------------------|
| Photographs Photo set-1.pdf | Photographs of exterior and interior items of property | | |
| Miscellaneous Appraisal.pdf | Appraisal Report of Grashof Appraisals, Inc., for property located at 5767 Mill St., Eaton, NY 13334 | 8/23/06 | |
| Dep't. of Treasury.pdf | Collection letter from Department of Treasury for unpaid delinquent debt owed to SBA, Debt Amt. \$96,523.19 FedDebt Case ID # 201000951813 Agency Debt ID # 2307725010 | 1/16/10 | |
| Settlement Statement.pdf | U.S. Housing and Urban Development Settlement Statement and miscellaneous <u>unsigned</u> closing papers. | | |
| SSA-36487.pdf | Support Services Alliance, Inc., Invoice No. 1988232; Social Security Administration Member ID No. 36487 | 11/19/07-8/20/07 | |

AN INVENTORY OF THE DOCUMENTATION PROVIDED TO LIBERTY MUTUAL BY THE INSUREDS ON MAY 18, 2010

Items 1 through 13 generally describe the documentation provided to Liberty Mutual by the Insureds for copying/scanning. Each category of documentation is described below, and in each case, the material was copied and scanned to a compact disk, with the exception of Items 13 and 14 which were not copied, but were returned to the Insureds.

- 1. An open Redweld file containing photographs.
- 2. A manila folder entitled "Utilities" containing NYSEG bills;
- 3. A manila folder entitled "Mortgage Insurance Documents" containing miscellaneous account statements for Franklin Credit, Bank of America, Countrywide, Alliance Bank and some Liberty Mutual bills;
- 4. A manila folder entitled "Court Papers" containing various pleadings in a Bank of New York action, venued in Madison County, and a J.P. Morgan action, venued in Nassau County;
- 5. A manila folder entitled "Audi Statements" containing various invoices from Audi regarding the lease of a vehicle;
- 6. An open Redweld file containing four manila folders containing various original documentation of bills, invoices and receipts relating to the various renovations of the Stone House;
- 7. An open Redweld file containing one manila folder entitled "Mortgage Appraisal" and containing two real estate appraisals;
- 8. An open Redweld file containing various bank statements from Chase;
- 9. A manila folder entitled "Credit Card Statements File II" containing credit card statements relating to the Discover Card, Home Depot card, Lowe's, and various life insurance documentation from AARP, Prudential, Sears Gold Master Card;
- 10. A manila folder containing bank statements from Alliance Bank;
- 11. A manila folder entitled "Credit Card Statements" containing statements from Citibank, Capital One, Beneficial, BMW, Bank of America and American Express;
- 12. A manilla folder entitled "Bank Statements" containing various Chase statements.
- 13. A manila folder entitled "Communications" containing various bills for telephone services from Time Warner Telephone/Internet Services from Time Warner Frontier, RCM, Verizon and MCI, most of which pre-date

- 2008, although there are a few bills for 2010, but no call detail; (These materials were not copied/scanned)
- 14. A manila folder entitled "Insurance" containing various documentation from or related to Liberty Mutual policy; (These materials were not copied/scanned).

TJO/sbh